

**UNITED STATES DISTRICT
COURT NORTHERN DISTRICT OF
ILLINOIS EASTERN DIVISION**

UNITED STATES OF AMERICA)	
Plaintiff)	Case No. 14 CR 00287-6
v.)	Honorable Judge
)	Charles R. Norgle,
James J. Carroll)	Presiding
Defendant)	

UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING

NOW COMES THE DEFENDANT, JAMES CARROLL, by and through his attorney, Jeffrey B. Steinback, and respectfully requests that an order be entered continuing the date of his sentencing hearing for 14-21 days, or to a later date, consistent with the calendar of this Honorable Court. In support of this motion, the following is stated.

1. Mr. Carroll pled guilty to one charge of bank fraud on February 3, 2018. His sentencing hearing is currently scheduled for April 14, 2022.
2. Defense Counsel, Jeff Steinback, has been working to prepare to go forward with this hearing on the scheduled date.
3. Defense counsel, has been having problems with several of his front teeth, requiring surgery and permanent replacements. Surgery was initially scheduled for permanent implant in late March, 2022, and was to have been completed by now. Unfortunately, when Mr. Steinback returned to the surgeon for that procedure in March, the permanent replacement that was

supposed to be implanted that day was defective. The surgeon determined that the implant would have to be reworked in order to align properly with his jaw. As such, the March appointment simply reinforced the temporary bridge that has been in place since January.

4. On April 11, 2022, Mr. Steinback received a call that the reconfigured implant was ready and the temporary needed to be replaced, scheduling scheduled him for the final surgical procedure on Wednesday, April 13, 2022, the day before the hearing for Mr. Carroll.
5. Defense asks for this short continuance as this implant involves Mr. Steinback's front teeth, the procedure will most likely affect his speech and will need time to heal and allow any swelling to recede.
6. Neither defendant, nor his counsel, Mr. Steinback, wish to inconvenience this Honorable Court in any way with this request. If it were not for the pressing need to have this overdue procedure, we would not seek this continuance.
7. A continuance of 14 -21 days, should this Court allow it, would enable Mr. Steinback to heal and be fully ready to present his arguments in Mr. Carroll's sentencing hearing.
8. AUSA Sarah North has been contacted and states that while the government does not oppose this motion, if this request is granted, they wish any continued date to be set as a final date for sentencing.
9. Mr. Steinback acknowledges that this Honorable Court and Ms. North have been quite understanding and realizes that should this motion be granted, it will be set as a final date for sentencing.

WHEREFORE, Defendant, James Carroll, by and through his attorney, Jeffrey B, Steinback prays this Honorable Court will grant this request and enter an Order continuing his sentencing date for 14-21 days, or to a date later, consistent with the

calendar of this Court.

Respectfully submitted,

s/ Jeffrey B Steinback

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